



SOUTHWEST MARINE, INC.
SAN DIEGO DIVISION

*"Specialists in Ship
Repair and Overhaul"*

Foot of Sampson St., P.O. Box 13308, San Diego, CA 92113-0308
(619) 238-1000 / Telex: 910-335-1167 (SWM SDG)

Corporate Offices: San Diego

June 24, 1985
Ser #1-5798

MEMORANDUM

To: General Distribution

From: Herb Engel

Subject: Hazardous Waste; generator of

As you can see by the enclosed memo, the State of California agrees with our position that Southwest Marine is not the generator of hazardous waste. As has always been the practice, no person from Southwest Marine is to sign as the "generator" for any hazardous waste that is removed from any commercial or naval vessel.

H1W
File

WU INFOMASTER

SWM SDG

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ONLY SAN DIEGO, CA MAY 28, 1985
PMS MR. NESTOR ACEDERA
CHIEF, SITE MITIGATION UNIT
CALIF STATE TOXIC SUBSTANCES CONTROL DIVISION
107 SOUTH BROADWAY ROOM 7011
LOS ANGELES, CA 90012 NTF

ON THE ADVICE OF MR. HUSSIEH OF YOUR OFFICE, WE ORIGINATE THE FOLLOWING INFORMATION AND REQUEST FOR ACTION.

WE ARE A PRIVATELY OWNED SHIP REPAIR YARD WITH LOCATIONS IN SAN DIEGO AND SAN PEDRO, UNDER THE PURVIEW OF YOUR DIVISION. WE ALSO HAVE SHIPYARDS IN SAN FRANCISCO AND AMERICAN SAMOA.

WE PERFORM WORK ON SHIPS OF THE U.S. NAVY. INCIDENT TO THAT WORK, WE HAVE REMOVED FROM THESE SHIPS LARGE AMOUNTS OF ASBESTOS WASTE AT THE GOVERNMENT'S DIRECTION. WE HAVE ALSO BEEN TOLD BY THE NAVY TO SIGN MANIFESTS AND ACT AS THE HAZARDOUS WASTE GENERATOR.

WE DO NOT BELIEVE THIS IS PROPER INTERPRETATION OF THE HEALTH AND SAFETY CODE. OUR UNDERSTANDING IS THAT THE U.S. NAVY AS THE "SHIP OWNER" IS THE GENERATOR AND THEREFORE RESPONSIBLE FOR MANIFESTING AND PROPER SHIPMENT/DISPOSAL OF THE HAZARDOUS SUBSTANCE.

REQUEST PROVIDE URGENT TELEX GUIDANCE AND APPROPRIATE DIRECTION IN THIS MATTER.

BRUCE GAIR, DIRECTOR INDUSTRIAL ENGINEER
SOUTHWEST MARINE, INC.
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